IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

Before the Honorable Hal R. Ray, Jr., U.S. Magistrate Judge

KELLY BLAND,

Plaintiff.

V.

1ST TEXAS HEALTH & LIFE LLC, et al.,

Defendants.

Civil Action No. 4:24-cv-01022-O

NOTICE OF CLARIFICATION REGARDING COUNTERCLAIMS

TO THE HONORABLE COURT:

Defendant **Aaron Hansome**, appearing pro se, respectfully submits this Notice of Clarification concerning the operative counterclaims (ECF No. 54) and prior language used in support of his Response in Opposition to Plaintiff's Motion for Judgment (ECF No. 73).

1. Correction of Reference to Civil Extortion Claim

Defendant wishes to respectfully clarify that, although civil extortion is referenced in recent briefing, it was **not formally included as a cause of action** in the First Amended Counterclaims filed April 18, 2025 (ECF No. 54), and no motion for leave to amend those counterclaims is currently pending.

2. Intent and Respect for the Court's Process

Defendant acknowledges that the above-referenced statement — "Defendant's counterclaims (ECF No. 54) for civil extortion..." — may be interpreted as asserting that civil extortion was already pled. This was not the intent. The reference arose from a broader discussion of patterns previously submitted to the Court, and Defendant regrets any confusion caused.

3. No Request for Leave at This Time

At this stage, and out of respect for the Court's current consideration of active motions and discovery issues, Defendant **does not seek to amend his counterclaims**. Defendant recognizes that the Court is in the best position to assess the appropriate procedural posture and whether any future amendments would be warranted.

4. Reservation of Rights

Defendant respectfully reserves the right to seek leave to amend should further discovery or Court findings suggest that the factual basis for such a claim becomes appropriate under Rule 15(a)(2). At present, however, no such motion is being made.

This clarification is made in good faith and with full respect for the Court's role in evaluating the sufficiency of pleadings and ensuring procedural integrity.

Respectfully submitted,

Aaron Hansome, Pro Se

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CERTIFICATE OF SERVICE

I, Aaron Hansome, the undersigned Defendant appearing pro se, hereby certify that on **July 10, 2025**, I served the foregoing **Notice of Clarification Regarding Counterclaims** on Plaintiff **Kelly Bland** by transmitting a true and correct copy via electronic mail to her address on file as follows:

Kelly Bland

Email: kellybland516@gmail.com

Executed this 10th day of July, 2025.

Respectfully submitted,

/s/ Aaron Hansome

Aaron Hansome, Pro Se